

***Worldcall Internet, Inc.***

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Electronic Filing - Via ECFS  
Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington DC 20554

**Re: WC Docket 05-196; Compliance Letter for Worldcall Internet, Inc.**

Dear Ms. Dortch:

Submitted herewith is the Compliance Letter for Worldcall Internet, Inc. ("Worldcall Internet") as required by the Commission (and clarified by the Enforcement Bureau) in Docket 05-196. Please refer any questions or correspondence regarding this matter to the undersigned.

Very truly yours,



W. Scott McCollough  
General Counsel, Worldcall Internet, Inc.

xc: Kathy Berthot (via Electronic Mail)  
Janice Myles (via Electronic Mail)  
Best Copy and Printing (via Electronic Mail)

*911 Solution: This description should include a quantification, on a percentage basis, of the number of subscribers to whom the provider is able to provide 911 service in compliance with the rules established in the VoIP 911 Order. Further, the detailed description of the technical solution should include the following components:*

At present, Worldcall Internet is approximately 99% compliant with the rules established in the VoIP 911 Order.

- 911 Routing Information/Connectivity to Wireline E911 Network: *A detailed statement as to whether the provider is transmitting, as specified in Paragraph 42 of the VoIP 911 Order, “all 911 calls to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority utilizing the Selective Router, the trunk line(s) between the Selective Router and the PSAP, and such other elements of the Wireline E911 Network as are necessary in those areas where Selective Routers are utilized. If the provider is not transmitting all 911 calls to the correct answering point in areas where Selective Routers are utilized, this statement should include a detailed explanation why not. In addition, the provider should quantify the number of Selective Routers to which it has interconnected, directly or indirectly, as of November 28, 2005.*

With the exception of the customers discussed below, Worldcall Internet is transmitting, as specified in Paragraph 42 of the VoIP 911 Order, “all calls to the appropriate PSAP, or appropriate local emergency authority utilizing the Selective Router, the trunk line(s) between the Selective Router and the PSAP, and such other elements of the Wireline E911 Network as are necessary in those areas where Selective Routers are utilized.”

Texas does not have a designated statewide default answering point, and therefore, Worldcall Internet does not utilize such a designated statewide default answering point in routing its calls.

Worldcall Internet is interconnected, directly or indirectly, to six Selective Routers as of November 28, 2005. All Selective Routers to which Worldcall is interconnected are located within Texas.

- Transmission of ANI and Registered Location Information: *A detailed statement as to whether the provider is transmitting via the Wireline E911 Network the 911 caller’s ANI and Registered Location to all answering points that are capable of receiving and processing this information. This information should include: (i) a quantification, on a percentage basis, of how many answering points within the provider’s service area are capable of receiving and processing ANI and Registered Location information that the provider transmits; (ii) a quantification of the number of subscribers, on a percentage basis, whose ANI and Registered Location are being transmitted to answering points that are capable of receiving and processing this information; and (iii) if*

*the provider is not transmitting the 911 caller's ANI and Registered Location to all answering points that are capable of receiving and processing this information, a detailed explanation why not.*

- (i) Worldcall Internet is capable of receiving and processing ANI and Registered Location information for 100% of the answering points within Worldcall Internet's service area for those answering points to whom Worldcall Internet is directly or indirectly interconnected.
  - (ii) One hundred percent (100%) of Worldcall Internet's subscribers' ANI and Registered Location information is being transmitted to answering points that are capable of receiving and processing this information, if Worldcall Internet is directly or indirectly interconnected to those answering points.
  - (iii) This section is inapplicable to Worldcall Internet.
- o 911 Coverage: *To the extent a provider has not achieved full 911 compliance with the requirements of the VoIP 911 Order in all areas of the country by November 28, 2005, the provider should: 1) describe in detail, either in narrative form or by map, the areas of the country, on a MSA basis, where it is in full compliance and those in which it is not; and 2) describe in detail its plans for coming into full compliance with the requirements of the order, including its anticipated timeframe for such compliance.*

Worldcall Internet does not provide interconnected VoIP service to any subscribers outside Texas. Worldcall Internet provides service in the following MSAs: Dallas, Fort Worth, Austin, San Antonio, Houston, Midland, and Lubbock. All Texas subscribers are in full compliance with the *VoIP 911 Order*, with three potential exceptions. Each subscriber that is potentially non-compliant is aware of the potential non-compliance.

A. Worldcall Internet has a subscriber located in Ovilla, Texas to whom it provides service. Worldcall Internet's 911 access vendor does not have connectivity to the PSAP that serves Ovilla, Texas. If the subscriber should require 911 call support, the call will be routed to the Dallas PSAP, and the Dallas PSAP will forward the call to the subscriber's local police department. Worldcall Internet does not have any plans to bring this subscriber into full compliance with the *VoIP 911 Order* because the cost is prohibitive. Worldcall Internet would cancel service if full compliance is mandated.

B. Worldcall Internet has a subscriber located in Sherman, Texas to whom it provides service. Worldcall Internet's 911 access vendor does not have connectivity to the PSAP that serves Sherman, Texas. This subscriber has maintained Verizon as its local service provider, and therefore, has maintained 911 access from its wireline LEC. Worldcall

Internet does not have any plans to bring this subscriber into full compliance with the *VoIP 911 Order* because the cost is prohibitive. Worldcall Internet would cancel service if full compliance is mandated.

C. Worldcall Internet has a subscriber located in Conroe, Texas to whom it provides service. This subscriber has maintained Consolidated as its local telecommunications service provider, and therefore has 911 call support. Consolidated has refused to port the subscriber's numbers to Worldcall Internet's underlying telecom service provider. Consolidated's reason for refusing to port the subscriber's numbers is because Worldcall Internet's underlying telecom service provider does not have an Interconnection Agreement with Consolidated. Due to this refusal, Worldcall Internet does not provide 911 call support for this subscriber. Worldcall Internet does not have any plans to bring this subscriber into full compliance with the *VoIP 911 Order* because the cost is prohibitive. Worldcall Internet would cancel service if full compliance is mandated.

*Obtaining Initial Registered Location Information: A detailed description of all actions the provider has taken to obtain each existing subscriber's current Registered Location and each new subscriber's initial Registered Location. This information should include, but is not limited to, relevant dates and methods of contact with subscribers and quantification, on a percentage basis, of the number of subscribers from whom the provider has obtained the Registered Location.*

Updated Registered Location information for Worldcall Internet's existing subscribers is gathered through routine subscriber contact by Worldcall Internet's sales department. Worldcall Internet obtains initial Registration Location information from its new subscribers using the order form when the service is ordered by the subscriber.

To date, Worldcall Internet has 100% of its subscribers' Registered Location information. This information was compiled between December 2004 and September 2005 either through routine contact by Worldcall Internet's sales department or from the subscriber at the time service is ordered.

*Obtaining Updated Registered Location Information: A detailed description of the method(s) the provider has offered its subscribers to update their Registered Locations. This information should include a statement as to whether the provider is offering its subscribers at least one option for updating their Registered Location that permits them to use the same equipment that they use to access their interconnected VoIP service.*

Worldcall Internet maintains contact with each of its subscribers on a monthly basis. It is during these monthly contacts that Worldcall Internet updates its subscriber's Registered Location information. At this time, Worldcall Internet does not provide an option for updating Registered Location information using the same equipment that subscribers use to access their interconnected VoIP service.

*Technical Solution for Nomadic Subscribers: A detailed description of any technical solutions the provider is implementing or has implemented to ensure that subscribers have access to 911 service whenever they use their service nomadically.*

Worldcall Internet does not support nomadic service.